June 13, 2012

## Sent via Hand Delivery

Ms. Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission Attention: Lorenzo Miller or John Emmett 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

**RE:** Expedited Waiver Request of Kennebec Telephone Company to Correct Erroneous Study Area Boundaries Used in the Regression Analysis Calculations

Dear Ms. Dortch:

Pursuant to 47 C.F.R § 1.3, Kennebec Telephone Company, Inc. ("Kennebec") respectfully submits this expedited Petition for Waiver. In the Order released on April 25, 2012, the Commission adopted a streamlined, expedited waiver process for carriers affected by the benchmarks to correct any errors in the study area boundaries.

In accordance with Paragraph 29 and Appendix C of the above-referenced Order, Kennebec hereby provides the Commission with a CD-R containing a WinZip archive with the requisite shapefiles and a corresponding readme file. Kennebec believes that the submission of this information complies with the Commission's file specifications outlined in Appendix C.

The files provided to the Commission today also support the multiple advocacy efforts made by Kennebec in 2012 to modify the Commission's erroneous input file from 305.633 square miles to reflect the actual size of Kennebec's service area which spans 742 square miles. On April 10, 2012, at the request of the Wireline Competition Bureau, Kennebec filed additional data, including a study area map and affidavit from the South Dakota Public Utilities Commission, attesting to the square mileage of the study area to support Kennebec's request of a correction to the data inputs used in the regression analysis calculations. A copy of the April 10<sup>th</sup> filing is included with this submission.

In regard to the expedited waiver process, it is the understanding of Kennebec that the Commission will review the submitted files to determine whether special circumstances (*i.e.*, inaccurate boundaries) support granting Kennebec's petition for waiver. If the Commission grants Kennebec's petition for waiver, Kennebec further understands that it will be exempt from the caps for 2012 and 2013. Kennebec also presumes that the Commission will update its input

files with the boundary data provided by Kennebec prior to rerunning the regression to calculate capex and opex limits that will be used for calculating support for 2014.

As President and General Manager of Kennebec Telephone Company, Inc., I certify under penalty of perjury that the information provided in the enclosed shapefiles accurately portrays the square mileage based on the most recent maps filed with the South Dakota Public Utilities Commission.

Respectfully submitted,

Rod Bowar

President/General Manager Kennebec Telephone Company

Encl.